

Exhibit B

Declaration of Dr. Sahera Al-Timimi (April 21, 2020)

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALI AL-TIMIMI,

Defendant.

Case No. 1:04-cr-385 (LMB)

DECLARATION OF DR. SAHERA AL-TIMIMI

Under 28 U.S.C. § 1746, I, Dr. Sahera Al-Timimi, state the following:

1. I am the mother of the defendant, Dr. Ali Al-Timimi. I am also a retired university professor and mental health specialist. I attended several days of Ali's trial in 2005.

2. Ali was diagnosed with asthma as a child. He has suffered frequent asthma attacks, which he treats with a prescription inhaler. I also know that he was diagnosed with hypertension in the years prior to his 2005 trial. I am deeply concerned for his health and well-being, particularly in light of the ongoing COVID-19 pandemic.

3. I am willing to be Ali's third-party custodian on release by this Court. Ali may stay confined in my apartment in Northwest Washington, DC. I will provide my address to the Court, but would prefer that it remain under seal, if possible.

4. At present, the apartment is occupied only by myself and my other son. We will have a dedicated bedroom where Ali may safely quarantine.

I so declare, under penalty of perjury, that the foregoing is true and correct.

Executed on: April 21, 2020


Dr. Sahera Al-Timimi